

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

WALTER EDWARD LEMM, JR., Individually
and on Behalf of All Others Similarly Situated,

Plaintiff,

v.

NEW YORK COMMUNITY BANCORP, INC.,
THOMAS R. CANGEMI and JOHN J. PINTO,

Defendants.

Case No. 1:24-cv-00903-NRM-JRC

DALE MISKEY, Individually and on
behalf of all others similarly situated,

Plaintiff,

v.

NEW YORK COMMUNITY BANCORP, INC.,
THOMAS ROBERT CANGEMI and JOHN J.
PINTO,

Defendants.

Case No. 1:24-cv-01118-NRM-JRC

**REPLY DECLARATION OF JAMES M. WILSON, JR. IN RESPONSE TO THE
OPPOSITION FILED BY BOSTON RETIREMENT SYSTEM AND IN FURTHER
SUPPORT OF SAND HOLLOW MANAGEMENT, LLC'S MOTION FOR: (1)
CONSOLIDATION OF THE RELATED ACTIONS; (2) APPOINTMENT AS LEAD
PLAINTIFF; AND (3) APPROVAL OF LEAD COUNSEL**

I, James M. Wilson, Jr., declare as follows:

1. I am a member in good standing of the bar of the State of New York and am admitted in this Court. I am a partner in the law firm of Faruqi & Faruqi, LLP. I submit this reply declaration in response to the opposition filed by Boston Retirement System and in further support of the motion filed by Sand Hollow Management, LLC (“Sand Hollow Management”), for: (1) consolidation of the above-captioned, related actions; (2) appointment of Sand Hollow Management as Lead Plaintiff; and (3) approval of Sand Hollow Management’s selection of Faruqi & Faruqi, LLP to serve as Lead Counsel for the Class. I have personal knowledge of the facts set forth herein and would testify thereto if called.

2. Attached as Exhibit A is a true and correct copy of the Declaration of Jason Stubbs Principal and Owner of Movant Sand Hollow Management LLC in Reply to the Opposition Filed by Boston Retirement System.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 29th day of April 2024 in New York, NY.

/s/ James M. Wilson, Jr.
James M. Wilson, Jr.